

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Jean-Marc Zimmerman
Zimmerman Law Group
233 Watchung Fork
Westfield, NJ 07090
Tel: (908) 768-6408
Fax: (908) 935-0751
jmz@zimllp.com

In Re:

Ramon A. Suarez
Norma I. Suarez

Debtor(s)

Case No.: 16-26032 / CMG

Hearing Date: July 19, 2017

Chapter: 13

Judge: Christine M. Gravelle

**MOTION FOR ENTRY OF ORDER GRANTING THE MOTION FOR ENTRY OF ORDER
DECLARING THE AUTOMATIC STAY TERMINATED AS UNOPPOSED**

(Related Docket No. 23)

TO THE HONORABLE COURT:

COMES NOW secured creditor Scotiabank Puerto Rico (“Scotiabank”), through its undersigned counsel, and respectfully states and prays as follows:

1. On June 7, 2017, Scotiabank filed a *Motion for Entry of Order Declaring the Automatic Stay Terminated* (the “*Motion for Entry of Order*”, Docket No. 23)
2. D.N.J. LBR 9013-2 states that “[a]ny (i) opposition to a motion or (ii) cross-motion must be filed and served not later than 7 days before the hearing date.”
3. The *Motion for Entry of Order* stated that if a timely opposition was filed, a hearing would be held on July 19, 2017. See the Notice of Motion, Docket No. 23. Therefore, the seven days lapsed on July 12, 2017.
4. To this day, the *Motion for Entry of Order* is unopposed.

WHEREFORE, Scotiabank respectfully requests the Court to enter an order granting the *Motion for Entry of Order* as unopposed. A proposed order was filed at Docket No. 23-3 in compliance with D.N.J. LBR 9013-1(a)(4).

Dated: July 17, 2017
Westfield, NJ

By: s/Jean-Marc Zimmerman
Jean-Marc Zimmerman
Zimmerman Law Group
233 Watchung Fork
Westfield, New Jersey 07090
Tel: (908) 768-6408
jmz@zimllp.com
Attorneys for Scotiabank Puerto Rico

Ferraiuoli LLC

Attorneys for Scotiabank
Puerto Rico
PO Box 195168
San Juan, PR 00919-5168
Tel.: (787) 766-7000
Fax: (787) 766-7001

/s/ Gustavo A. Chico-Barris
GUSTAVO A. CHICO-BARRIS
USDC-PR No. 224205
USDC-MA No. 568818
gchico@ferraiuoli.com